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February 10, 2020

Caridad Hichez v. Saul 19 Civ. 5493 (MKV)(BCM)

Re:

MEMO ENDORSED

Via ECF

Hon. Barbara C. Moses United States Magistrate Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Dear Judge Moses:

I am writing to request an extension of time, <u>nunc pro tunc</u>, to complete plaintiff's papers in the above-captioned case. Plaintiff's papers were due to be filed on Friday, February 7, 2020. They were filed on February 8, 2020.

I unfortunately continue to have a considerable workload and I was not able to complete plaintiff's papers on Friday and did not file until Saturday, February 8, 2020. I regret my repeated delays in this case and I apologize to the Court and opposing counsel for the disruption to your respective schedules. With the kind consent of opposing counsel, Emily Fishman, Esq, I request the following revised schedule:

February 8, 2020 Plaintiff's Motion for Judgment on the Pleadings
April 8, 2020 Defendant's Cross-Motion for Judgment on the Pleadings
April 22, 2020 Plaintiff's Reply Brief
May 13, 2020 Defendant's Reply Brief

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes Christopher J. Bowes, Esq

cc: AUSA Emily Fishman SSA/Office of the General Counsel – Region II 26 Federal Plaza, Room 3904 New York, NY 10278 Attorney for Defendant

David Kuznicki, Esq. Attorney for plaintiff

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J. February 10, 2020